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THE SUNRIDER CORPORATION, SUNRIDER
11 TAIWAN, INC. and SUNRIDER
MANUFACTURING, L.P.

12 And for Counter-Defendants
13 THE SUNRIDER CORPORATION and TEI FU
CHEN
14

15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17

18 THE SUNRIDER CORPORATION, dba
SUNRIDER INTERNATIONAL, a Utah
19 corporation, SUNRIDER TAIWAN,
INC., a Delaware corporation, and
20 SUNRIDER MANUFACTURING, L.P.,
a California limited partnership,

21 Plaintiffs,

22 vs.

23 BOUNTIFUL BIOTECH CORP., a
24 California corporation, BOUNTIFUL
NATURAL HEALING, INC., a
25 California corporation, KING SHOP
INTERNATIONAL, INC., a California
26 corporation, STEVE S. LEE, an
individual, SHUN SHENG CHEN aka
27 SAM CHEN, an individual,
BOUNTIFUL HEALTHCARE
28 TECHNOLOGY CORP., business form

CASE NO.: SACV 08-1339 DOC
(AJWx)

**STIPULATED JUDGMENT FOR
INJUNCTIVE RELIEF AND
RETENTION OF JURISDICTION
TO ENFORCE SAME; PARTIAL
DISMISSAL OF CLAIMS**

Complaint filed: November 24, 2008

1 unknown, and DOES 1 Through 10,
2 inclusive,

3 Defendants.

4 AND RELATED COUNTERCLAIMS.
5

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7 Pursuant to the settlement agreement between Plaintiffs THE SUNRIDER
8 CORPORATION, dba SUNRIDER INTERNATIONAL, SUNRIDER TAIWAN,
9 INC., and SUNRIDER MANUFACTURING, L.P., on the one hand, and defendant
10 STEVE S. LEE (“Lee”), on the other hand, the Court hereby orders that the
11 following final judgment be entered in this action:
12

13 1. Lee shall be, and is hereby, permanently enjoined from engaging in,
14 and therefore shall permanently cease participation in any capacity in any business
15 venture or organization owned or substantially controlled or operated, directly or
16 indirectly, by Bountiful Healthcare Technology Corporation (“BHTC”) or any other
17 defendant in the Action anywhere in the world, and shall permanently cease any
18 and all direct or indirect efforts to recruit or solicit any Sunrider distributor (defined
19 to include Sunrider’s Independent Business Owners (IBOs), Authorized Business
20 Owners (ABOs), Potential ABOs, customers, and consumers who were or have
21 become affiliated with Sunrider on or after November 18, 2008) or employees to
22 join or participate in any capacity in any business venture or organization owned or
23 substantially controlled or operated, directly or indirectly, by BHTC or any other
24 defendant in the Action anywhere in the world. Lee is also ordered to publish and
25 enforce rules for his employees, agents, affiliates and any other person or entity
26 directly or indirectly under his control forbidding them from engaging in this same
27 conduct.
28

1 3. Lee is permanently enjoined from engaging in, directly or indirectly,
2 the manufacture, formulation, advertising, licensing, shipping, distribution, or sales,
3 anywhere in the world, of any products in any language that:

4
5 a. Infringe on Sunrider's intellectual property rights, including by
6 way of example but without limitation, rights with respect to those products
7 bearing the Sunrider name or logo, or a similar logo or name, and products
8 with the names the same as or substantially similar to LIVESTREAM,
9 HERBAL NUTRIPLUS, TOPBRAIN, VITALITGENE, METAPOWER, or
10 HEMOGREEN/HEMOGREEN; or,

11
12 b. Were or are developed, designed or created, in whole or in part,
13 by Lee during the time of his employment with Sunrider or with the use of
14 Sunrider resources, including by way of example but without limitation,
15 products with the current or former names the same as or substantially
16 similar to BOUNTIGREEN, HEMOGREEN/HOMEGREEN,
17 METAPOWER, OUTERFORCE, INNERFORCE, TOTAL BEAUTY,
18 VIGOROUS, HERBAL NUTRIPLUS, HERBAL NUTRIBALANCE,
19 DETOX SLIM FORMULA, FRUIT AND VEGETABLE WASH,
20 LIVESPRING, CLARITY BEVERAGE, TOTAL BEAUTY, LIVE
21 INTAKE, LIVE AIR, LIVESTREAM, LIVE DEFENSE, LIVE FORCE,
22 OUTER FORCE, GLUCOTONE, MEN'S FORTUNE, TOP BRAIN, or
23 BIOKAL/BIOCAL; or,

24
25 c. Are the same as or substantially similar in name, ingredients or
26 formulation to Sunrider products, including by way of example but without
27 limitation, products known as HERBAL NUTRIPLUS (comparable to
28 Sunrider's NUPLUS®), HERBAL NUTRIBALANCE (comparable to

1 Sunrider's NUPLUS®), TOTAL BEAUTY (comparable to Sunrider's
2 BEAUTY PEARL™), FRUIT AND VEGETABLE WASH (comparable to
3 Sunrider's FRUIT AND VEGETABLE RINSE), HEMOGREEN and/or
4 HOMEGREEN (comparable to Sunrider's EVERGREEN®), MEN'S
5 FORTUNE (comparable to Sunrider's DR. CHEN'S™ MENS
6 FORMULA™), CLARITY BEVERAGE (comparable to Sunrider's
7 FORTUNE DELIGHT®), BIOKAL and/or BIOCAL (comparable to
8 Sunrider's HERB CAL® TAB), TOPBRAIN (comparable to Sunrider's
9 TOP®, JOI®, and ESE®), LIVESTREAM (comparable to Sunrider's
10 LIFESTREAM®), or SUPERCLEAN (comparable to Sunrider's
11 SUPERCLEAN™).

12
13 4. Lee is permanently enjoined from engaging in, directly or indirectly,
14 anywhere in the world and regardless of the medium, the infringement of Sunrider's
15 copyrighted works, including by way of example but without limitation, the works
16 reproduced in Exhibit 1 of the Second Amended Complaint in this Action.

17
18 5. The words "indirect" or "indirectly" as used in this injunction shall
19 include actions taken by persons or entities who are both: (1) directors, officers,
20 employees, agents, distributors, or representatives of Lee, or of any entity he
21 substantially controls or owns; (2), and who act under his supervision or control.
22 Lee is hereby ordered to give all such persons and entities prompt notice of this
23 injunction. All such persons and entities are hereby enjoined from the acts
24 described above when they act under Lee's supervision or control.

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1 6. All other claims of Sunrider against Lee only are hereby dismissed; however,
2 the court hereby retains jurisdiction for the purposes of enforcing this injunction
3 against Lee and others.

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5 7. The clerk is ordered to enter this Judgment forthwith.

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7 IT IS SO ORDERED.

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9 Dated: June 16, 2010

A handwritten signature in dark ink, reading "David O. Carter", is written over a horizontal line.

10 Hon. DAVID O. CARTER

11 UNITED STATES DISTRICT JUDGE
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